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CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

FILED

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2008 Grand Jury

UNITED STATES OF AMERICA	)	CR 08-208 (A) -PSG
Plaintiff.	)	FIRST SUPERSEDING
v.	)	<u>I N D I C T M E N T</u>
CALVIN THOMAS, aka "Frog,"	)	[21 U.S.C. § 846: Conspiracy;
JAMES RUSSELL HAMPTON III, aka "Q-102," and	)	21 U.S.C. § 856(a): Maintaining a Drug-Involved Premises; 21 U.S.C. §§ 841(a) (1), 841(b) (1) (A) (iv):
ERIC ANDRE THOMAS, aka "E-Rock,"	)	Possession with Intent to Distribute Phencyclidine; 21 U.S.C. § 841(a)(1): Possession with Intent to Distribute Marijuana]
Defendants.	)	

The Grand Jury charges:

At all times relevant to this First Superseding Indictment:

1. Defendant CALVIN THOMAS, also known as ("aka") "Frog," ("defendant CALVIN THOMAS") lived at 235 East 102<sup>nd</sup> Street, Los Angeles, California. The 235 East 102<sup>nd</sup> Street property included a single-family home ("the house"), where defendant CALVIN THOMAS resided, and a detached garage ("the garage") that

LSM:

1 had been converted also to serve as a residence.

2 2. For various periods of time, co-conspirator Eric White  
3 ("co-conspirator White") also lived in the house.

4 3. Defendant JAMES RUSSELL HAMPTON III, aka "Q-102,"  
5 ("defendant HAMPTON") lived in the garage at the house.

6 4. Defendant ERIC ANDRE THOMAS, aka "E-Rock," ("defendant  
7 ERIC THOMAS") also lived in the garage.

8 5. These Introductory Allegations are hereby incorporated  
9 by reference into each count of this First Superseding  
10 Indictment as though set forth fully therein.

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1 COUNT ONE

2 [21 U.S.C. § 846]

3 A. OBJECTS OF THE CONSPIRACY

4 Beginning on a date unknown and continuing until in or  
5 about May 2008, within the Central District of California and  
6 elsewhere, defendants CALVIN THOMAS, aka "Frog," JAMES RUSSELL  
7 HAMPTON III, aka "Q-102," and ERIC ANDRE THOMAS, aka "E-Rock,"  
8 co-conspirator Eric White, and others known and unknown to the  
9 Grand Jury, conspired and agreed together to: (1) open, lease,  
10 rent, use, and maintain a place, that is, the property located  
11 at 235 East 102<sup>nd</sup> Street, Los Angeles, California, for the  
12 purpose of manufacturing, distributing, and using a controlled  
13 substance, in violation of 21 U.S.C. § 856(a)(1); (2) manage and  
14 control a place, that is, the property located at 235 East 102<sup>nd</sup>  
15 Street, Los Angeles, California, as the owner, lessee, occupant  
16 and mortgagee, and knowingly and intentionally to rent, lease,  
17 use, and make available for use, such place for the unlawful  
18 purpose of storing, distributing, and using controlled  
19 substances, in violation of 21 U.S.C. § 856(a)(2); and (3)  
20 possess with intent to distribute phencyclidine, in violation of  
21 U.S.C. §§ 841(a) (1), 841(b)(1)(A)(iv).

22 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE  
23 ACCOMPLISHED

24 The objects of the conspiracy were to be accomplished in  
25 substance as follows:

26 1. Defendant CALVIN THOMAS would occupy a house owned by

1 his mother at 235 East 102<sup>nd</sup> Street, Los Angeles, California.  
2 Knowing that they were involved in the unlawful manufacture and  
3 distribution of controlled substances, including phencyclidine  
4 ("PCP") and marijuana, defendant CALVIN THOMAS would allow  
5 defendants HAMPTON and ERIC THOMAS, co-conspirator White, and  
6 others, to live at the residence, either in the house or in a  
7 converted garage located behind the house.

8 2. Defendants CALVIN THOMAS, HAMPTON, and ERIC THOMAS,  
9 co-conspirator White, and others, would manufacture and store  
10 PCP in the yard behind the garage. Defendants also would store  
11 quantities of PCP and chemicals and equipment used in the  
12 manufacture of PCP both in the yard behind the garage and in an  
13 area between the garage and the house.

14 3. Defendants HAMPTON and ERIC THOMAS would keep scales  
15 and sandwich bags used to package and distribute marijuana in  
16 the garage.

17 4. Defendants HAMPTON and ERIC THOMAS, co-conspirator  
18 Eric White, and others, would sell PCP and marijuana to  
19 individuals who came to the 235 102<sup>nd</sup> Street address looking to  
20 purchase PCP and marijuana.

21 C. OVERT ACTS

22 In furtherance of the conspiracy and to accomplish the  
23 objects of the conspiracy, defendants CALVIN THOMAS, JAMES  
24 RUSSELL HAMPTON III, and ERIC ANDRE THOMAS, co-conspirator Eric  
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1 White, and others, committed the following overt acts, among  
2 others, within the Central District of California:

3 1. On or about November 15, 2007, in a bedroom in the  
4 garage, defendant HAMPTON possessed a Scope mouthwash bottle  
5 containing a quantity of PCP.

6 2. On or about November 15, 2007, defendants CALVIN  
7 THOMAS, HAMPTON, and ERIC THOMAS, co-conspirator White, and  
8 others, stored several buckets and trash cans used for the  
9 manufacture of PCP in the back yard of the 235 E. 102<sup>nd</sup> Street  
10 property.

11 3. On or about November 15, 2007, defendants CALVIN  
12 THOMAS, HAMPTON, and ERIC THOMAS, co-conspirator White, and  
13 others, stored a number of containers of chemicals used in the  
14 manufacture of PCP, including piperidine, in the back yard of  
15 the 235 E. 102<sup>nd</sup> Street property.

16 4. On or about November 15, 2007, defendants CALVIN  
17 THOMAS, HAMPTON, and ERIC THOMAS, co-conspirator White, and  
18 others, stored two bottles containing quantities of PCP in the  
19 back yard of the 235 E. 102<sup>nd</sup> Street property.

20 5. On or about January 30, 2008, defendant ERIC THOMAS  
21 attempted to conceal a white plastic bag containing  
22 approximately 475.8 grams of marijuana behind a bush on the 235  
23 E. 102<sup>nd</sup> Street property.

24 6. On or about January 30, 2008, at the 235 E. 102<sup>nd</sup>  
25 Street address, defendant ERIC THOMAS possessed approximately  
26 .75 grams of marijuana on his person.

1       7. On or about January 30, 2008, defendant ERIC THOMAS  
2 possessed a scale and plastic sandwich bags in the garage at the  
3 235 E. 102<sup>nd</sup> Street property.

4       8. On or about January 30, 2008, at the 235 E. 102<sup>nd</sup>  
5 Street property, defendants CALVIN THOMAS, HAMPTON, and ERIC  
6 THOMAS, co-conspirator White, and others, possessed a five-  
7 gallon bucket containing approximately two gallons of PCP.

8       9. On or about January 30, 2008, at the 235 E. 102<sup>nd</sup>  
9 Street property, defendants CALVIN THOMAS, HAMPTON, and ERIC  
10 THOMAS, co-conspirator White, and others, possessed a gas can  
11 containing approximately 10 milliliters of PCP.

12      10. On or about February 7, 2008, at the 235 E. 102<sup>nd</sup>  
13 Street property, co-conspirator White sold approximately eight  
14 ounces of PCP to a customer.

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1 COUNT TWO  
2 [21 U.S.C. § 856(a)]

3 On or about January 30, 2008, in Los Angeles County,  
4 within the Central District of California, defendants CALVIN  
5 THOMAS, also known as ("aka") "Frog," JAMES RUSSELL HAMPTON III,  
6 aka "Q-102," and ERIC ANDRE THOMAS, aka "E-Rock," co-conspirator  
7 Eric White, and others, knowingly opened, leased, rented, used,  
8 and maintained a place, that is, the property located at 235  
9 East 102<sup>nd</sup> Street, Los Angeles, California, for the purpose of  
10 manufacturing, distributing, and using controlled substances,  
11 namely, marijuana, a schedule I controlled substance, and  
12 phencyclidine ("PCP"), a schedule II controlled substance.

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1 COUNT THREE  
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[21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(iv)]

3 On or about January 30, 2008, in Los Angeles County, within  
4 the Central District of California, defendants CALVIN THOMAS,  
5 also known as "Frog," JAMES RUSSELL HAMPTON III, aka "Q-102,"  
6 and ERIC ANDRE THOMAS, aka "E-Rock," co-conspirator Eric White,  
7 and others, knowingly and intentionally possessed with the  
8 intent to distribute more than one kilogram, that is  
9 approximately 7500 grams, of a mixture or substance containing a  
10 detectable amount of phencyclidine ("PCP"), a schedule II  
11 controlled substance.

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1 COUNT FOUR

2 [21 U.S.C. §§ 841(a)(1)]

3 On or about January 30, 2008, in Los Angeles County, within  
4 the Central District of California, defendant ERIC ANDRE THOMAS,  
5 also known as "E-Rock," knowingly and intentionally possessed  
6 with the intent to distribute approximately 475.8 grams of  
7 marijuana, a schedule I controlled substance.

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9 A TRUE BILL

10 15

11 Foreperson

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14 THOMAS P. O'BRIEN  
United States Attorney

15 *Christine C. Ewell*

16 CHRISTINE C. EWELL  
Assistant United States Attorney  
17 Chief, Criminal Division

18 LAWRENCE S. MIDDLETON  
19 Assistant United States Attorney